

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANA MARGARITA MARTINEZ,

Plaintiff,

Case No. 07 CV 6607 (VM)

vs.

THE REPUBLIC OF CUBA,

Defendant.

**DECLARATION OF JOSEPH A. DEMARIA IN SUPPORT OF PLAINTIFF ANA
MARGARITA MARTINEZ'S MOTION FOR ISSUANCE OF WRIT OF EXECUTION**

JOSEPH A. DEMARIA, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the Bar of the United States District Court for the Southern District of New York and am a partner in the law firm of Tew Cardenas LLP, counsel to Plaintiff Ana Margarita Martinez in the above-captioned matter. I submit this declaration in conjunction with, and in support of, Ms. Martinez's Motion for Issuance of Writ of Execution. This declaration is based on my personal knowledge.

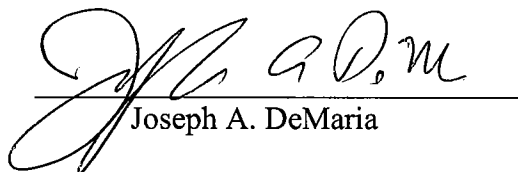
2. On July 23, 2007, Ms. Martinez filed her Complaint in this Court for an action on a judgment against the Republic of Cuba. (D.E. 1.) As stated in that Complaint, Ms. Martinez obtained a final judgment in her favor against the Republic of Cuba, pursuant to the Foreign Sovereign Immunities Act, 28 U.S.C. § 1602 *et seq.* in the case styled as Ana Margarita Martinez v. The Republic of Cuba, Case No. 99-18008 CA 20, Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida. As the Republic of Cuba did not appear in the Miami-Dade County Circuit Court to defend, her state court judgment was obtained by default.

3. After this Court entered a Default Judgment against the Republic of Cuba on December 7, 2007 (D.E. 16) (the "Judgment"), a copy of the Judgment was sent to the Republic of Cuba (to the attention of the Minister of Foreign Relations) by DHL courier on December 10, 2007. The DHL confirmation shows that the delivery was received in Havana, Cuba on December 17, 2007. A copy of the DHL confirmation of receipt is attached hereto as Exhibit 1.

4. The Republic of Cuba has not appeared in these proceedings or otherwise responded to the Judgment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 25, 2008.



Joseph A. DeMaria

@PFDesktop\::ODMA/MHODMA/DMS_NT;Miami;499971;1

EXHIBIT 1



Track results detail

► [Print this page](#)

Tracking results detail for 7918589604

Tracking summary

Current Status **✓ Shipment delivered.**
 Delivered on 12/17/2007 10:40 am
 Delivered to
 Signed for by **VACILIA**

Tracking history

Date and Time	Status	Location
12/17/2007 10:40 am	Shipment delivered.	Havana, Cuba
9:04 am	With delivery courier.	Havana, Cuba
12/16/2007 8:40 pm	Arrived at DHL facility.	Havana, Cuba
12/15/2007 4:08 pm	Transit through DHL facility	Havana, Cuba
12/13/2007 6:24 am	Depart Facility	Wilmington - Clinton Field, OH
4:28 am	Processed at DHL Location.	Wilmington - Clinton Field, OH
12:17 am	Clearance processing complete	Wilmington - Clinton Field, OH
12/11/2007 5:04 am	Shipment on Hold.	Wilmington - Clinton Field, OH
3:03 am	Clearance Delay	Wilmington - Clinton Field, OH
2:34 am	Transit through DHL facility	Wilmington - Clinton Field, OH
2:32 am	In transit.	Wilmington - Clinton Field, OH
12/10/2007 10:46 pm	Depart Facility	Miami Gateway, FL
9:36 pm	Transit through DHL facility	Miami Gateway, FL
9:17 pm	Depart Facility	Miami - Tamiami, FL
8:14 pm	Processed at DHL Location.	Miami - Tamiami, FL
6:37 pm	Shipment picked up	Miami - Tamiami, FL

Ship From:
 TEW CARDENAS PA
 Miami, FL 33131
 United States

Ship To:
 Habana, Cuba

Shipment Information:
 Ship date: 12/12/2007
 Pieces: 1
 Total weight: 1 lb *

Attention:
 TEW CARDENAS PA

Attention:

Ship Type:
Shipment Reference: NR
Service: Express
Special Service:
Description: DOC

Tracking detail provided by DHL: 1/23/2008, 2:54:51 pm pt.

You are authorized to use DHL tracking systems solely to track shipments tendered by or for you to DHL. Any other use of DHL tracking systems and information is strictly prohibited.

*** Note on weight:**

The weights displayed on this website are the weights provided when the shipment was created. Actual chargeable weights may be different and will be provided on invoice.

DHL EXPRESS (USA), INC.

DHL Express (USA), Inc., 1200 South Pine Island Road, Plantation, Florida 33324

Original (DHL Billing) Copy

REORDER 764803480-2 Process and Track your shipment online: http://www.dhl.com 1-800-CALL-DHL in USA only	QTY 100 <div style="border: 1px solid black; padding: 5px; text-align: center;"> CHG CHG 791 8589 604 </div>	DESTINATION CODE <div style="border: 1px solid black; padding: 5px; text-align: center;"> 08E </div>	3/15/06
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> 1 Payer account number and shipment value protection details Charge to <input checked="" type="checkbox"/> Shipper <input type="checkbox"/> Receiver <input type="checkbox"/> 3rd Party Payer Account No. _____ Shipment Value Protection (see reverse) <input type="checkbox"/> Yes Declared Value for Carriage (in US \$) _____ <input type="checkbox"/> No, all payment options are available in all countries. </div> <div style="width: 50%;"> 2 From (Shipper) Shipper's Account Number 764803480 Shipper's Reference (up to 35 characters) 20726.002 Company Name TEN CARDENAS PA Address 15TH FL 1441 BRICKELL AVE MIAMI FL Post/ZIP Code (required) 33131 Phone, Fax, or E-mail (required) (305) 536-1112 </div> </div>			
3 To (Receiver) Company Name THE REPUBLIC OF CUBA Contact Minister of Foreign Relations Felipe Perez Roque Calzada No. 360, Esquina AG Vedado, Havana Cuba Country _____ Post/ZIP Code (required) _____ Phone, Fax, or E-mail (required) _____			
4 Shipment Details <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Total number of packages 1 Total Weight of D-HL Express Document packaging used, enter XD: _____ lbs Dimensions (in inches) Length _____ Width _____ Height _____ Pieces _____ </div> <div style="width: 50%;"> 5 Full Description of Contents Give Content and Quantity <div style="border: 1px solid black; padding: 10px; text-align: center;"> DOCUMENTS RECEIPTA DE VOUCHER </div> </div> </div>			
6 Datable Shipments Only (Customs requirement) Attach the original and four copies of a Proforma or Commercial Invoice . Export License No./Symbol (if applicable) [Receiver's VAT/GST or Shipper's EIN/SSN] _____ Declared Value for Customs (in US \$) _____ (see commercial invoice for details) YES TRANSLATION NUMBER _____ Destination Duties/Taxes: If left blank, Receiver pays duties/taxes. <input type="checkbox"/> Receiver <input checked="" type="checkbox"/> Shipper <input type="checkbox"/> Other: _____ TYPE OF EXPORT <input type="checkbox"/> Permanent <input type="checkbox"/> Repatriation <input type="checkbox"/> Temporary Schedules B Number / Harmonized Code (if applicable) _____ Declaration: technology or software to be exported from the U.S. are in compliance with the U.S. Export Administration Regulations.			
7 Shipper's Authorization (signature required) (We agree that DHL's standard terms apply to this shipment and limit DHL's liability for loss or damage to U.S. \$100. The Warsaw Convention may also apply (see reverse). We authorize DHL to complete other documents necessary to export this shipment. We understand that Shipment to certain countries may require additional documentation on our part. We agree to pay any charges if the recipient or 3rd party refuses to accept the shipment.) Signature (required) <i>[Signature]</i> Date 3/15/07			